



May 23, 2022

VIA ECF

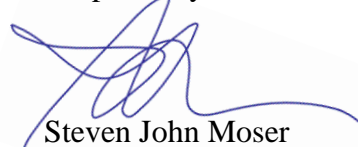
Hon. Cheryl L. Pollak, USMJ  
United State District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Fuentes v. CCNGJG Enterprises, Inc.*, 19-cv-7113

Dear Judge Pollak:

I represent the Plaintiff Cesar O. Fuentes (“Plaintiff”) in the above-reference matter. I write in reply to defendants’ assertion the provision of the NYLL which authorizes a 15% increase for an unpaid judgment is only applicable to Plaintiffs’ claims under Article 6 of the NYLL (plaintiff’s wage notice and wage statement claims under NYLL §§ 195 & 198). In fact, both article 6 and article 19 of the NYLL, *which cover the Plaintiff’s claims in their entirety*, include a provision authorizing a court to include a provision increasing a judgment by 15% in the event it remains unpaid. *See* NYLL §§ 198(4) & 663(4).

Respectfully submitted



Steven John Moser